

From: [Steven S. Biss](#)
To: [D. Margeaux Thomas](#)
Cc: [Maya Srour](#)
Subject: Re: Morgan Supplement
Date: Friday, May 22, 2020 10:35:59 AM

Margeaux,

Your explanation for how Radack learned Eric Morgan's email address is unconvincing. What did she "google"? How did she know what to "google" if she did not retain her direct messages. His Twitter account is suspended.

What role is "Lisa Ling" playing in all this?

I am not agreeable to removing the ATTORNEY'S EYES ONLY designation.

I do not trust your client to share the identity of Mr. Morgan with third parties. The identity of a whistleblower is highly sensitive.

I object to your client attending the deposition on the 4th.

Finally, please email me the deposition exhibits you intend to use. You produced 58 pages of documents, none of which relate to Mr. Morgan. I do not expect that you will show up to the deposition with documents that were not produced in discovery.

From: D. Margeaux Thomas
Sent: Thursday, May 21, 2020 10:36 AM
To: Stevenbiss@earthlink.net
Cc: Maya Srour
Subject: Morgan Supplement

Steven,

I am requesting that the "attorney eyes only" designation be removed from the supplemental responses and documents that you produced relating to Eric Morgan. As you know, my client is aware of Eric Morgan's identity, she obtained his identity from information you provided in the publicly filed pleadings in this case, which include the fact that he is male, a lawyer, resides in Florida, his twitter account was suspended, etc. Furthermore, there is nothing highly sensitive, such as trade secrets, personal financial statements, or tax returns, included in the material you produced.

Please also let me know whether you have any objection to my client attending the Zoom video deposition of Eric Morgan on June 4th.

Thank you,

D. Margeaux Thomas



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